



February 12, 2009
Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

**RE: 2008 CPNI Certification Filing - Inmate Calling Solutions, LLC d/b/a
ICSolutions; EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of Inmate Calling Solutions, LLC d/b/a ICSolutions as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to rmorton@tminc.com.

Sincerely,

Robin Norton
Consultant to Inmate Calling Solutions, LLC

RN/lm

cc: Best Copy and Printing, Inc. - FCC@BCPIWEB.COM
cc: Suzanne Haffner - ICS
file: ICS - FCC
tms: FCCx0901

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: **2008**

Name of company covered by this certification: **Inmate Calling Solutions, LLC d/b/a
ICSolutions**

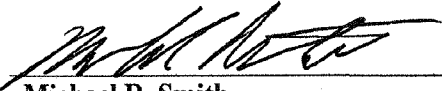
Form 499 Filer ID: **824136**

Name of signatory: **Michael R. Smith**

Title of signatory: **President**

I, **Michael R. Smith**, certify and state that:

1. I am the **President** of **Inmate Calling Solutions, LLC d/b/a ICSolutions** and, acting as an agent of the company, I have personal knowledge of **Inmate Calling Solutions, LLC d/b/a ICSolutions's** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **Inmate Calling Solutions, LLC d/b/a ICSolutions'** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



Michael R. Smith,
President

2/11/09

Date

Exhibit A
Statement of CPNI Procedures and Compliance

**Statement of CPNI Procedures and Compliance
For 2008
Inmate Calling Solutions, LLC d/b/a ICSolutions**

Inmate Calling Solutions, LLC ("ICS") operates primarily as an inmate telephone service provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of its telephone services consist of casual traffic provided without any presubscribed service relationship. ICS does not have any information that relates to the quantity, technical configuration, type, or location of the consumer's subscribed telecommunication services. Moreover, ICS does not, in the ordinary course, obtain any CPNI that could be used for marketing purposes. Calls are either billed by the consumer's local exchange carrier or provided on a prepaid basis only.

ICS' marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should ICS expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that (i) notification is provided and consumer approval obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

ICS has processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail. ICS does not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the caller provides date and time of the subject call and they can verify same against ICS' records. The called party's local phone company bills call charges on a collect basis and has its own controls for disclosure and access to applicable information.

For called parties who establish a prepaid account, ICS typically obtains customer name, address, and phone number in order to establish the account. However, since its telephone services are based on contractual relationships directly or indirectly with correctional facilities, ICS does not market any telephone services directly to consumers and, therefore, any information that could be deemed CPNI is only used for account administration purposes.

ICS' contracts with correctional facilities specify that call detail is the sole property of the correctional facility and that ICS must only disclose or allow access to this data by a) authorized correctional facility personnel, b) paying party for billing purposes, or c) applicable ICS personnel for technical and billing support purposes only. Correctional Facility and ICS personnel must have a valid user ID and password in order to access this data at any time. Such personnel are assigned User IDs and passwords to enable controlled access to call detail records and recordings for inmate calls placed from the facility with which they are associated. This access is handled on-site only by an authorized facility administrator. The administrator at each location will also establish and manage the process for any lost password replacement. The system provides for a password expiration which forces users to modify their password on a frequent basis for added security. Passwords are not assigned based on readily-available biographical information.

Any other requests for call detail by outside parties are referred to designated management personnel at the correctional facilities who are themselves representatives of state and/or local law enforcement and, therefore, operate under applicable jurisdictional policies. Direct third party requests for call record detail must be made subject to a subpoena or other court sanctioned process.

As an inmate telephone service provider, ICS does not have any retail locations and therefore does not disclose CPNI on any "in-store" basis.

ICS has procedures in place to notify law enforcement in the event of a breach of the call detail records. Since ICS' customers are law enforcement entities, ICS defers to such entities for any escalation to federal agencies. ICS has not experienced any such breaches during 2008, but has a process in place to maintain records of any such breaches if/when discovered.

ICS has not taken any actions against data brokers in the past year.

ICS did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

Due to the nature of the inmate calling service business, the underlying call detail is not tied to any presubscribed customers. Accordingly, ICS has not developed any information with respect to the processes pretexters may use to attempt to access CPNI.